Case 23-80007 Doc 21 Filed 01/31/23 Entered 01/31/23 11:29:19 Desc Main Document Page 1 of 3

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

IN RE:) Chapter 7
VOLKAN TURAN	No. 23-80007
Debtor	·. Hon, Thomas M. Lynch

NOTICE OF MOTION

To: See Attached Service List

YOU ARE HEREBY NOTIFIED that on February 15, 2023 at 11:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Thomas M. Lynch, **either** in courtroom 3100 of the Stanley J. Roszkowski United States Courthouse, 327 South Church St., Rockford, Illinois 61101, **or** electronically as described below, and then and there present MOTION FOR CONVERSION OF CHAPTER 7 CASE TO CHAPTER 13 CASE, a copy of which is attached hereto and herewith served upon you.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or telephone.

To appear by video, use this link: https://www.zoomgov.com/. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and passcode. The meeting ID for this hearing is 160 291 5226 - the password is 852255. The meeting ID and further information can also be found on the Judge Thomas's web page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ David R. Herzog
One of his attorneys

David R. Herzog
LAW OFFICE OF DAVID R. HERZOG, LLC
Attorneys for the Debtor
53 W. Jackson Blvd., Suite 1442
Chicago, IL 60604
(312) 977-1600
drh@dherzoglaw.com
ARDC No. 01203681

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused to be served a copy of the foregoing instrument on the attached service list via ECF or by enclosing same in an envelope addressed to them, with postage fully prepaid, and by depositing the envelope in the U.S. Mail at 53 W. Jackson Blvd., Chicago, Illinois 60604, on this 31st day of January, 2023.

$/_{\rm S}/$	David R.	Herzog	
--------------	----------	--------	--

SERVICE LIST

VIA ECF

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St Room 873 Chicago, IL 60604 USTPRegion11.ES.ECF@usdoj.gov

Joseph D. Olsen, Chapter 7 Trustee Attorney at Law 5702 Elaine Drive, Suite 104 Rockford, IL 61108-2458 Jolsenlaw@comcast.net Tatyana Rivtis c/o Charles Aaron Silverman 8800 Bronx Ave Suite 100-F Skokie, IL 60077 csilverman@cas-pc.com

VIA REGULAR MAIL

Vulkan Turan 5 Barrington Bourne Barrington, IL 60010-9612

Chicago Title Land Trust Company c/o Johnson & Bell, Ltd. 33 W. Monroe St., Suite 2700 Chicago, IL 60603-5404

Jefferson Capital Systems, LLC P.O. Box 7999 Saint Cloud, MN 56302-7999

John and Andrea Erickson 7831 Davis St. Morton Grove, IL 60053-1818 Mint Corporation 5 Barrington Bourne Barrington, IL 60010-9612

Mint Remodeling Corporation 5 Barrington Bourne Barrington, IL 60010-9612

Select Portfolio Servicing P.O. Box 65250 Salt Lake City, UT 84165-0250

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

IN RE:) Chapter 7
VOLKAN TURAN	No. 23-80007
Debtor.	Hon, Thomas M. Lynch

MOTION FOR CONVERSION OF CHAPTER 7 CASE TO CHAPTER 13 CASE

NOW COMES the Debtor, VOLKAN TURAN, by and through his attorneys, David R. Herzog and the LAW OFFICE OF DAVID R. HERZOG, LLC, moves this Honorable Court for an Order converting the above-referenced matter from Chapter 7 to one under Chapter 13. In support of his motion, Debtor states as follows:

- 1. The debtor, VOLKAN TURAN, filed a petition under Chapter 7 on January 5, 2023.
- 2. Debtor seeks to voluntarily convert this matter from under Chapter 7 to one under Chapter 13.
- 3. Pursuant to 11 U.S.C. Section 706(a), the Debtor is eligible to be indebted under Chapter 13 of the Code.

WHEREFORE, the Debtor requests that the above-referenced matter be converted from a Chapter 7 to a case under Chapter 13.

Respectfully submitted,

VOLKAN TURAN

By: /s/ David R. Herzog
One of his attorneys

David R. Herzog LAW OFFICE OF DAVID R. HERZOG, LLC Attorneys for the Debtor 53 W. Jackson Blvd., Suite 1442 Chicago, IL 60604 (312) 977-1600 drh@dherzoglaw.com